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March 3, 2021

The Honorable Susan Richard Nelson
Judge of U.S. District Court
316 North Robert Street
St. Paul, MN 55101

Via ECF Filing

*Re: Kaarin Schaffer as Trustee for the Next of Kin of George Floyd v.
Derek Chauvin, et. al.
U.S. District Court File No. 20-CV-01577 (SRN/TNL)*

Dear Judge Richard Nelson:

I am writing with the concurrence of counsel for all parties in this case to provide information to the Court regarding the status of the Stay of this civil case during the pendency of the criminal proceedings against the four police officers.

The current Stay, a product of prior stipulations of counsel, expires by its terms on April 1st. Counsel have conferred at some length regarding a Stipulation to further extend the Stay during the pendency of the criminal matters. One of them (the Chauvin “lead” case) is scheduled to begin March 8th with jury selection and actual trial on March 29th and is expected to last several weeks, while trial of the other three officers is scheduled in mid-August.

Counsel are in agreement with the concept of extending the Stay until the criminal proceedings conclude, but have not been able to agree to specifics yet due, in part, to some unusual features and uncertainties of what may occur in the short-term about the “lead” case. The uncertainty may be alleviated within the next week or two, and counsel anticipate that they then will be able to submit to the Court a new Stipulation for a proposed extension of the Stay.

In the meantime, in order to assure that the current Stay does not expire prior to the time a hearing may be held, we will later this week be filing on behalf of the Defendants Motion papers for a scheduled hearing on Friday, March 19th to extend the Stay.

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We anticipate that, during the next couple of weeks, the matter may be resolved, a joint Stipulation submitted to the court, and, if acceptable, the Motion will be withdrawn upon entry of an Order consistent with the Stipulation.

If not, we will proceed with the scheduled Motion in March 19th.

We will keep the Court advised of developments.

Thank you for your consideration.

Respectfully submitted,

MEYER NJUS TANICK, PA

/s/: Marshall H. Tanick

Marshall Tanick

MHT/dt

Cc: All Counsel of Record